

KEVIN V. RYAN, CSBN 118321
 United States Attorney
 JOANN M. SWANSON, CSBN 88143
 Assistant United States Attorney
 Chief, Civil Division
 EDWARD A. OLSEN, CSBN 214150
 Assistant United States Attorney
 450 Golden Gate Avenue, Box 36055
 San Francisco, California 94102
 Telephone: (415) 436-6915
 FAX: (415) 436-7169

Attorneys for Defendants

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

VADIM FIODOROVICH SHVETS,

Plaintiff,

v.

ALBERTO GONZALES, Attorney General, U.S.
 Department of Justice; MICHAEL CHERTOFF,
 Secretary of the U.S. Department of Homeland
 Security; EMILIO T. GONZALEZ, Director of
 the U.S. Citizenship and Immigration Services;
 DAVID STILL, San Francisco District Director,
 U.S. Citizenship and Immigration Services;

Defendants.

No. C 06-0738 CRB

**STIPULATION TO EXTEND DATES;
 and ~~PROPOSED~~ ORDER**

Plaintiff, appearing *pro se*, and Defendants, by and through their attorneys of record, hereby stipulate, subject to the approval of the Court, to the following:

1. Petitioner filed this action on or about February 2, 2006. Defendants answer is currently due on April 4, 2006.

2. Pursuant to this Court's February 2, 2006 Order Setting Initial Case Management Conference, the parties are required to file a joint case management statement on April 28, 2006, and attend a case management conference on May 5, 2006.

3. The parties have agreed to give the defendants a 30-day extension of time to file their answer.

1 4. Accordingly, in order to allow sufficient time for USCIS to answer and prepare a joint case
2 management statement, the parties hereby respectfully ask this Court to extend the dates in the
3 Court's scheduling order as follows:

4 Last day to file Defendant's Answer	May 4, 2006
5 Last day to file Joint ADR Certification	May 11, 2006
6 Last day to file/serve Joint Case Management Statement:	June 2, 2006
7 Case Management Conference:	16 June 9, 2006, at 8:30 a.m.

8
9
10 Date: April 4, 2006

Respectfully submitted,

11 KEVIN V. RYAN
12 United States Attorney

13
14 /s/
15 EDWARD A. OLSEN
16 Assistant United States Attorney
17 Attorneys for Defendant

18
19 Date: April 4, 2006

20 /s/
21 VADIM FIODOROVICH SHVETS
22 *Pro Se*

23 **ORDER**

24 Pursuant to stipulation, IT IS SO ORDERED.

25
26 Date: April 7, 2006

